

**Docket No. AUS920030524US1**

***PATENT***

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re application of: **Chen et al.**

Serial No. **10/631,070**

Filed: **July 31, 2003**

For: **Chinese / Pin Yin / English**  
**Dictionary**

§ Group Art Unit: **2626**

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§ Examiner: **Neway, Samuel G.**

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§ Confirmation No.: **3480**

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§ Attorney Docket No.: **AUS920030524US1**

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**37945**

PATENT TRADEMARK OFFICE  
CUSTOMER NUMBER

**Commissioner for Patents**  
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**REPLY BRIEF (37 C.F.R. 41.41)**

This Reply Brief is submitted in response to the Examiner's Answer mailed on October 5, 2009.

No fees are believed to be required to file a Reply Brief. If any fees are required, I authorize the Commissioner to charge these fees which may be required to IBM Corporation Deposit Account No. 09-0457.

## RESPONSE TO EXAMINER'S ANSWER

The Examiner made several arguments in section 10, Response to Arguments, of the Examiner's Answer. These arguments are addressed below.

### **I. Whether the combination of Chinese-English Dictionary and lookup (CEL Web Page) fails to disclose "simultaneously displaying ... the Simplified Chinese character [and] the Traditional Chinese word" (Appeal Brief, page 8)**

The Examiner states that Appellants argue that the combination of Chinese-English Dictionary and lookup (CEL Web Page) fails to disclose "simultaneously displaying ... the Simplified Chinese character [and] the Traditional Chinese word" (Appeal Brief, page 8)" because CEL displays the original Traditional Chinese character, a Pin Yin word, and an English translation but fails to disclose displaying a Simplified Chinese translation. In response, the Examiner states:

However, it is Chinese-English Dictionary which is relied upon to teach the different translations (translating any input from the list including Traditional Chinese, Simplified Chinese, Pin Yin, and English into any other language/representation in the list). Lookup (CEL Web Page) is relied upon to teach displaying a translated input word and its multiple translations simultaneously. It would have been obvious to one with ordinary skill in the art to have used lookup's teaching of simultaneously displaying a word and many of the word's translations to display Chinese-English Dictionary's input word along with its many translations. The combination of Chinese-English Dictionary and lookup therefore teaches "simultaneously displaying ... the Simplified Chinese character [and] the Traditional Chinese word".

The Examiner seeks to establish that the entire element is disclosed by the cited combination. The Examiner errs because the cited combination fails to disclose the entire element. The CEL Web Page is as follows:



The Chinese-English Dictionary is as follows:

**Chinese-English Dictionary**

Search  as   
Output as  . Look for

Therefore, CEL Web Page and Chinese-English Dictionary disclose the following:

- Chinese characters can be pasted into a notepad (CEL Web Page).
- An English word can be inserted into and input field (Chinese-English Dictionary).
- A selection of the search language can be made using a drop down menu (Chinese-English Dictionary).
- An output can be selected using a drop down menu (Chinese-English Dictionary).
- A place to look can be selected using a drop down menu (Chinese-English Dictionary).
- Activating a look it up button will cause the search to be conducted in accordance with the three selections described above (Chinese-English Dictionary).

However, assuming that a Chinese character can be pasted into the “Search Field”, three choices must be made by the user to specify the language of the search, the language of the output, and where to look in conducting the search. Thus, a word can be inserted into the search field by copying and pasting. The word can be inserted in one language, the word can be searched in another language, the output may be displayed in another language, and the search may be made in multiple selectable locations. Alternatively, the word may be inserted and the selections made for the same language. But the combined art cannot produce the claim limitation “simultaneously displaying the Simplified Chinese word, the Traditional Chinese Word equivalent, the accented Pin Yin word, and the English Word” because an entirely new graphical user interface would have to be developed in order to do so. In addition, software would have to

be added to the combination in order for the combination to function because the combination lacks the capability to perform the claim limitation. Appellants' claim limitation is depicted in the application drawings Figure 9 set forth below:

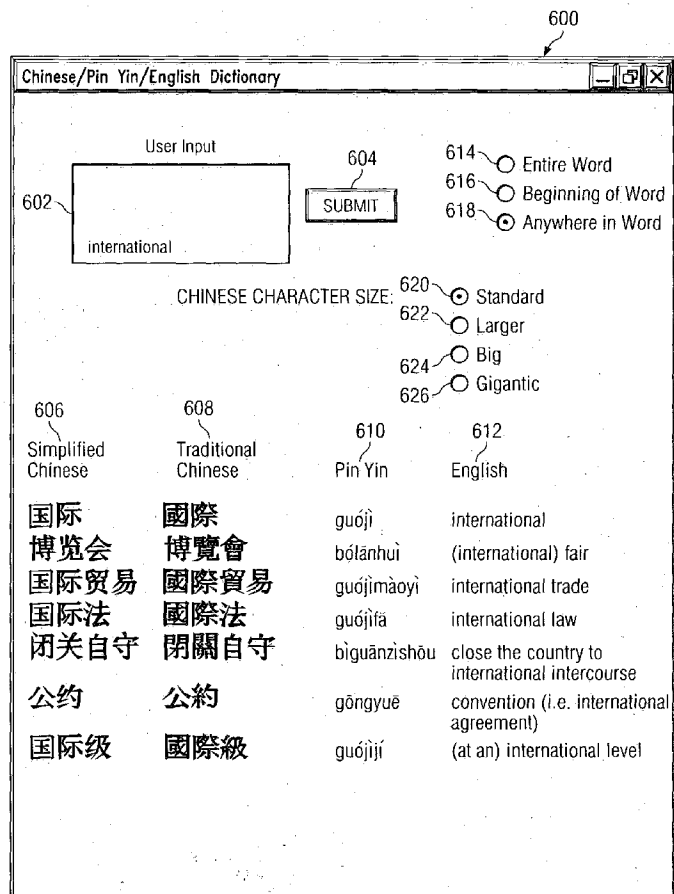


FIG. 9

Thus, comparing the complete claim element to the cited art in combination cannot provide the claim element because after copying a word into the search field of Chinese-English Dictionary, several more steps must be completed in order to get a single result. Chinese-English Dictionary, while capable of producing different results can only produce one result at a time. Therefore, Appellants submit that the Examiner erred in combining the references because Appellants claim simultaneous display of four different items in response to only one input and a single activation of a submit button. While the prior art may be able to provide the translations one or two at a time, the prior art cannot present all four items at once in response to only a single activation after having placed the word in the input field. The prior art can provide two

translations for each input in CEL Web Page. The prior art can provide one translation at a time in Chinese-English Dictionary, albeit intermediate steps can take place in different languages. Nevertheless, together, the prior art can only provide one translation at a time because the Examiner has incorporated CEL's cut and paste into Chinese-English Dictionary. Moreover, the Examiner has not explained how the combination can provide all three translations at one time. Furthermore, CEL discloses copying and pasting words consisting of multiple characters as explained above. CEL displays the characters that have been highlighted and two translations, but not the character and three translations as set forth in the claim. This addition is more than a simple addition--the value is that it eliminates steps and saves the user time. The user does not have to make selections and go back and forth in order to get all four items displayed side by side. Nothing in the cited art teaches or suggests providing such a display with only one button to activate. Therefore, whether CEL Web Page is incorporated into Chinese English Dictionary or vice versa, the cited art cannot provide the functionality and the manner of providing the functionality recited in the claims.

**II. Whether Chinese-English Dictionary and lookup (CEL Web Page) fails to disclose "responsive to a user activation of a single control ... displaying" because lookup (CEL Web Page) is silent to responding to activating a single control to pop up its display (Appeal Brief, page 8)**

In regard to the element "responsive to a user activation of a single control ... displaying," The Examiner states the following:

Lookup (CEL Web Page) discloses triggering the dictionary displaying the translations not only automatically (as Appellants argue) but also manually (Page 1, Section entitled "What's new in Version 2.0?") which reads on Appellants' "responsive to a user activation of a single control ... displaying".

Appellants submit that the Examiner erred because the cited portion of CEL does not disclose what the Examiner cites it for. CEL Web Page states the following:

**What's new in Version 2.0 ?**

Version 2.0 was released on January 23rd, 1999. Now you can...

- Select dictionary entries and save them to a file for later study or reference
- Choose the Romanisation to be used in displaying dictionary entries (*Pinyin* or *Gwoyeu Romatzyh* ("GR"))

- Choose how the dictionary lookup is triggered (automatically or manually)
  - Choose the style of window ("always-on-top" or standard)
  - Select the display font
- And settings such as the size and position of CEL's window are now recorded for the next time you use CEL.

The reference states that lookup can be triggered automatically or manually. The reference does not state how these functions are provided automatically or manually. The reference is silent beyond those words set forth above. No technical details are provided. Moreover, the combined references cannot provide the full functionality claimed by Appellants. Appellants' Figure 4 shows the four items displayed as claimed in the claims on appeal. Appellants' claim limitation is a "one click" operation that provides three translations in response to one click. Moreover, the three translations are displayed side by side with the input word. CEL Web Page displays only two translations--an equivalent word, and an English translation--along with the word itself. Furthermore, the combination does not provide for a single display in which the user input, the activation control, and the four items are displayed in one area.

### **III. Whether Hill teaches "[t]he method of claim 15 wherein a first font size of the Simplified Chinese word and the Traditional Chinese word is user configurable to be larger than a second font size of the accented Pin Yin word, and the English word."**

In regard to claims 20 and 45, Appellants submit that Hill does not teach "[t]he method of claim 15 wherein a first font size of the Simplified Chinese word and the Traditional Chinese word is user configurable to be larger than a second font size of the accented Pin Yin word, and the English word." First, the Examiner mischaracterized the claim element by paraphrasing the element in his answer. Specifically, the Examiner left out the words "user configurable." The full claim element, set forth above, recites "user configurable." Further, claim 15 recites a graphical user interface. Therefore, the claim, taken as a whole, allows the display of the independent claim to be configured by the graphical user interface. The Examiner states:

However, it is the combination of lookup and Hill that is relied upon as teaching this limitation. Lookup discloses different font sizes for the Chinese characters and the English characters (see the CEL window where the Chinese characters are bigger than the English characters). Hill is relied upon for teaching user

configurable font sizes. Hill discloses a user-defined browser font size (col. 9, lines 27-31). It would have been obvious to one with ordinary skill in the art to have made the font sizes of the characters present in CEL window user configurable.

The cited portion of Hill states only that “[t]he capabilities of the display device may include resolution, size and color palette” and that “[t]he capabilities may also include user-defined browser parameters, such as the size of browser window and the browser font size.” The CEL window is set forth above. The Chinese characters happen to be larger than the English text. However, there is no disclosure, teaching, or suggestion to provide Appellants’ limitation as a configurable limitation. There is no teaching or suggestion to allow configuration at a graphical user interface providing the functionality as claimed in the independent claim. There is not motivation in Hill for a person skilled in the art to combine Hill with CEL window and Chinese-English Dictionary.

## **CONCLUSION**

For the reasons set forth above, and in Appellants' main brief, the rejection of the appealed claims should be reversed.

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Respectfully submitted,  
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